

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**SHAREN KAYLOR,
et. al.**

Plaintiffs,

V.

**HOBBY LOBBY
STORES, INC.**

Defendants.

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**NOTICE OF REMOVAL FROM
THE CIRCUIT COURT FOR
HOWARD COUNTY,
MARYLAND,
CASE NO.: C-13-CV-23-000097
CIVIL ACTION NO.**

PETITION FOR REMOVAL

Pursuant to 28 U.S.C., Section 1441(a), the Defendant, Hobby Lobby Stores, Inc., respectively, notices the removal of the above-captioned matter to this Honorable Court from the Circuit Court for Howard County, Maryland, based on diversity of citizenship, and as grounds therefore, states as follows:

1. On or about May 24, 2023, Defendant was served with a Summons and Complaint in an action commenced by the Plaintiffs in the Circuit Court for Howard County as Docket Number C-13-CV-23-000097. True and correct copies of this Summons and Complaint are attached hereto. No further proceedings have taken place in this action.

2. This Notice of Removal was filed within thirty (30) days of receipt of service by Defendant, and, therefore, it is timely filed Pursuant to 28 U.S.C., Section 1446(b).

3. Pursuant to the Federal Rules of Civil Procedure, the Petitioner filed a written Answer to Plaintiffs' Complaint on June 15, 2023. Copies of Defendant's Answer and Notice of Removal are attached hereto.

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4. In their Complaint, Plaintiffs seek judgment against the Defendant in an amount in excess of seventy-five thousand dollars (\$75,000.00) in compensatory damages, plus interest and costs.

5. At the time of commencement of this action, Plaintiffs were and are now residents of the State of Maryland.

6. At the time of commencement of this action, and at all other times relevant to the subject proceeding, Defendant's principal place of business is Oklahoma City, Oklahoma and is incorporated in the State of Oklahoma.

7. As this is a civil action where the amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, the Honorable Court has diversity of jurisdiction over this matter Pursuant to 28 U.S.C., Section 1332.

8. The Petitioner presents and files herewith four hundred and two dollars (\$402.00) for the filing fees, required by law.

WHEREFORE, the Defendant, Hobby Lobby Stores, Inc., respectively, request to remove this action from the Circuit Court for Howard County, Maryland to the United States District Court for the District of Maryland.

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Respectfully submitted,

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By:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of June 2023, a copy of the foregoing was forwarded, via email, to:

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